

EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS LIST ON EXHIBIT A TO
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS SERVED
BY CHAITMAN LLP, DATED MARCH 22,
2017,

Defendants.

Adv. Pro. Nos. Listed on Exhibit A to
Second Set of Requests for Production
of Documents served by Chaitman
LLP, dated March 22, 2017

**TRUSTEE IRVING H. PICARD'S RESPONSES AND OBJECTIONS TO
DEFENDANTS' SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO THE TRUSTEE**

Irving H. Picard (the "Trustee"), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS"), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-78lll ("SIPA"), and the estate of Bernard L. Madoff, by and through the Trustee's counsel, Baker & Hostetler LLP, hereby provides the following Responses and Objections to Defendants' Second Set of Requests for Production of Documents to the Trustee ("Request" or

“Requests”), served by Defendants (“Defendants”) Listed on Exhibit A, in 88 cases¹ (“Adversary Proceedings”), dated March 22, 2017.

OBJECTIONS TO DEFINITIONS

1. The Trustee objects to the term Document in Definition 2 as inconsistent with Local Rule 26.3(c)(2) of the United States District Court for the Southern District of New York and this Court insofar as the Definition is far more broad than the definition contained in the Local Rules. The Trustee will respond to Requests containing Document as they are defined by Local Rule 26.3(c)(2).

OBJECTIONS TO INSTRUCTIONS

2. The Trustee will respond to these Requests consistent with Rules 26 and 34 of the Federal Rules of Civil Procedure (as amended on December 1, 2015) (the “Federal Rules”), Rules 7026 and 7034 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), applicable Local Civil Rules of the United States District Court for the Southern District of New York and this Court (the “Local Rules”), and any applicable orders of the Court, including the Court’s November 10, 2010 Litigation Procedures Order [ECF No. 3141] (“Litigation Procedures Order”) and the Court’s June 6, 2011 Litigation Protective Order [ECF No. 4137] (“LPO”).

¹ The Trustee objects to these Requests as improperly and untimely served in the following 14 cases where fact discovery was closed prior the service date of the Requests on March 22, 2017: *Picard v. Helene Saren-Lawrence*, Adv. Pro. No. 10-04898; *Picard v. Carol Nelson*, Adv. Pro. No. 10-04658; *Picard v. Carol Nelson, et al.*, Adv. Pro. No. 10-04377; *Picard v. Donald A. Benjamin*, Adv. Pro. No. 10-04621; *Picard v. Benjamin T. Heller*, Adv. Pro. No. 10-04367; *Picard v. D. M. Castelli*, Adv. Pro. No. 10-04956; *Picard v. Judd Robbins*, Adv. Pro. No. 10-04503; *Picard v. Robert S. Whitman*, Adv. Pro. No. 10-04614; *Picard v. Allen Meisels*, Adv. Pro. No. 10-04428; *Picard v. Robert Hirsch*, Adv. Pro. No. 10-04740; *Picard v. Zieses Investment Partnership*, Adv. Pro. No. 10-04669; *Picard v. Lisa Beth Nissenbaum*, Adv. Pro. No. 10-04878; *Picard v. Barbara Kotlikoff Harman*, Adv. Pro. No. 10-05130; and *Picard v. Joseph S. Popkin Revocable Trust*, Adv. Pro. No. 10-04712.

**SOURCES OF INFORMATION RELEVANT TO THE CLAIMS AND DEFENSES IN
THE TRUSTEE’S POSSESSION, CUSTODY OR CONTROL**

1. Hard-copy documents from the offices of BLMIS, offsite storage used by BLMIS, and other locations (“Hard-Copy BLMIS Documents”).

2. Electronic documents obtained from among approximately 20,000 pieces of media from the offices of BLMIS, offsite storage used by BLMIS, and other locations (“BLMIS Electronic Documents” or “BLMIS ESI”).

I. BLMIS DOCUMENTS

From the Hard-Copy BLMIS Documents and BLMIS ESI (collectively, “BLMIS Documents”), the Trustee created a searchable electronic database containing approximately 4.7 million Hard-Copy BLMIS Documents and 25 million BLMIS Electronic Documents (“the **BLMIS Searchable Database**”). Defendants do not have direct access to the BLMIS Searchable Database because it contains documents relating to thousands of customers, many of which are not relevant to this proceeding. Instead, the Trustee provides all defendants in these proceedings with documents as described below:

A. Proof of BLMIS’s Fraud and Insolvency: The Trustee created E-Data Room 1 from documents in the BLMIS Searchable Database as well as some Third-Party Documents. E-Data Room 1 contains documents relevant to the issues of the fraud conducted at BLMIS and its insolvency, and includes documents relating to BLMIS operations, regulatory disclosures, and financial records. *See Appendix A* for a description of documents available to Defendants in E-Data Room 1.

B. BLMIS Core Account Documents: The Trustee identified and segregated BLMIS core account documents for all customers (“Core Account Documents”). These Core Account Documents include account opening agreements, correspondence to and from BLMIS,

transfer and/or redemption requests, customer statements, Portfolio Management and/or Portfolio Management Transaction Reports, which contain transaction history, and other documents that were specific to each account, and/or the Trustee's calculation of net equity of a particular BLMIS account. Collectively, the Core Account Documents and the Bank Transfer Documents represent the documents produced to Defendants by the Trustee with his initial disclosures (the "Initial Disclosure Documents"). *See* **Appendices** that were produced with the Initial Disclosure Documents for each Adversary Proceeding.

- C. Proof of Transfers:** In addition to the Core Account Documents relevant to transfers described above, the Trustee identified and segregated BLMIS bank account records that reflect transfers to customers ("Bank Transfer Documents"). Collectively, the Core Account Documents and the Bank Transfer Documents represent the Trustee's Initial Disclosure Documents that were produced to Defendants. *See* **Appendices** that were produced with the Initial Disclosure Documents for each Adversary Proceeding.
- D. Other Documents:** The Trustee preserved the nearly 20,000 pieces of BLMIS ESI and millions of pages of BLMIS Hard-Copy Documents in his possession, but did not include all such documents in the BLMIS Searchable Database. The Trustee did not process or scan, for example, backup tapes believed to contain redundant data, some floppy disks or CDs, and broken media. In responding to the Requests, the Trustee does not search for BLMIS documents outside of the BLMIS Searchable Database. The Trustee will identify additional BLMIS Documents (meaning other than those described in Paragraphs A and B) from the BLMIS Searchable Database provided that the parties agree to narrowly tailored search terms and parameters that target documents relevant to the claims or

defenses and proportional to the needs of the case in accordance with Federal Rule 26(b)(1). *See Appendix B* for a description of sources of documents in the BLMIS Searchable Database.²

II. THE SQL DATABASES

Information contained in certain BLMIS Hard-Copy Documents, BLMIS ESI, and certain Third-Party Documents was processed and input into multiple Microsoft Structured Query Language (“SQL”) Server tables and databases (the “SQL Databases”). To the extent feasible, the underlying documents used to build the SQL Databases are contained in E-Data Room 1. SQL Databases are used by the Trustee’s experts and are available for production to any defendant upon request. Use of the SQL Databases requires some technical expertise. *See Appendix C* for the sources of data loaded into the SQL Databases.

THE TRUSTEE’S OBJECTIONS

1. Materials Prepared Post-December 11, 2008: The Trustee will not produce or log Documents prepared by and/or received by him, his counsel, his professionals and/or other agents from on or after December 11, 2008 that are not relevant and/or are protected by the attorney work product doctrine, the attorney-client privilege, and/or any other applicable privileges or protections (“Materials Prepared Post-December 11, 2008”).

2. Redundant, Cumulative, and Marginally Relevant Information: The BLMIS Searchable Database may contain information that is responsive to the Requests but which is redundant, cumulative, or marginally relevant (for example, the defendants’ names or account numbers appear on a list of customer names or account numbers and there is no other unique information). The Trustee objects to the identification of this information or Documents to the

² Certain defendants with proper credentials have direct access to millions of Third-Party Documents in the Trustee’s possession. These documents are governed by the Third-Party Data Room Order. Per that Order, the Third-Party Data Rooms are not available to Defendants in these Adversary Proceedings.

extent that such identification is not proportionate to the needs of the case under Federal Rule 26(b)(1) (“Redundant, Cumulative, and Marginally Relevant Information”).

3. Information Outside the Scope of Relevance: The Trustee objects to the disclosure of any information or identification of any Documents outside the scope of relevance articulated in Federal Rule 26 and Section 4(G) of the Litigation Procedures Order (“Information Outside the Scope of Relevance”).

4. The Trustee further objects to these Requests to the extent that fact discovery was closed prior to the service of them or is otherwise untimely pursuant to the operative case management order in any of the applicable Adversary Proceedings.³

5. The Trustee objects to the service of these Requests, to the extent they seek Documents relating to the December 20, 2016 deposition testimony of Bernard L. Madoff (“Madoff Deposition”), in any Adversary Proceeding that was not authorized by the Court to participate in the Madoff Deposition.⁴

³ The Trustee objects to these Requests as improperly and untimely served in the following 14 cases where fact discovery was closed prior the service date of the Requests on March 22, 2017: *Picard v. Helene Saren-Lawrence*, Adv. Pro. No. 10-04898; *Picard v. Carol Nelson*, Adv. Pro. No. 10-04658; *Picard v. Carol Nelson, et al.*, Adv. Pro. No. 10-04377; *Picard v. Donald A. Benjamin*, Adv. Pro. No. 10-04621; *Picard v. Benjamin T. Heller*, Adv. Pro. No. 10-04367; *Picard v. D. M. Castelli*, Adv. Pro. No. 10-04956; *Picard v. Judd Robbins*, Adv. Pro. No. 10-04503; *Picard v. Robert S. Whitman*, Adv. Pro. No. 10-04614; *Picard v. Allen Meisels*, Adv. Pro. No. 10-04428; *Picard v. Robert Hirsch*, Adv. Pro. No. 10-04740; *Picard v. Zieses Investment Partnership*, Adv. Pro. No. 10-04669; *Picard v. Lisa Beth Nissenbaum*, Adv. Pro. No. 10-04878; *Picard v. Barbara Kotlikoff Harman*, Adv. Pro. No. 10-05130; and *Picard v. Joseph S. Popkin Revocable Trust*, Adv. Pro. No. 10-04712.

⁴ The following cases listed on Exhibit A to the Requests were not included in the Court’s Order Authorizing the Deposition of Bernard L. Madoff (ECF. No. 14213) and thus, the Requests were improperly served in these Adversary Proceedings: *Picard v. RAR Entrepreneurial Fund*, Adv. Pro. No. 10-04352; *Picard v. Marlene Krauss*, Adv. Pro. No. 10-04489; *Picard v. Gerald and Barbara Keller Family Trust*, Adv. Pro. No. 10-04539; *Picard v. Felice Perlman*, Adv. Pro. No. 10-04541; *Picard v. Robert F. Ferber*, Adv. Pro. No. 10-04562; *Picard v. The Whitman Partnership*, Adv. Pro. No. 10-04610; *Picard v. Russell Dusek*, Adv. Pro. No. 10-04644; *Picard v. Peter Kamenstein*, Adv. Pro. No. 10-04648; *Picard v. Andrew M. Goodman*, Adv. Pro. No. 10-04709; *Picard v. Carla Ginsburg*, Adv. Pro. No. 10-04753; *Picard v. Betty Cohen*, Adv. Pro. No. 10-04768; *Picard v. Leslie Ehrlich*, Adv. Pro. No. 10-04837; *Picard v. Estate of Steven I. Harnick*, Adv. Pro. No. 10-04867; *Picard v. Edward F. Seligman*, Adv. Pro. No. 10-04885; *Picard v. Savin*, Adv. Pro. No. 10-04889; *Picard v. Train Klan*, Adv. Pro. No. 10-04905; *Picard v. Edyne Gordon*, Adv. Pro. No. 10-04914; *Picard v. The Estate of Leonard Miller*, Adv. Pro. No. 10-05094; *Picard v. Leonard J. Oguss*, Adv. Pro. No. 10-05116; *Picard v. Atwood Management*, Adv. Pro. No. 10-05127; and *Picard v. Plafsky Family*, Adv. Pro. No. 10-05150.

REQUESTS FOR PRODUCTION

Request No. 1

All hold harmless and/or indemnification agreements between Bernard L. Madoff and any of the following dating from 1980 on:

- a. Jeffrey Picower and/or his family members;
- b. Norman Levy and/or his family members;
- c. Carl Shapiro and/or his family members;
- d. Stanley Chais and/or his family members.

Response to Request No. 1

The Trustee objects to this Request on the grounds that it seeks documents outside the scope of relevance (Objection No. 3). Any purported “hold harmless and/or indemnification agreements” are neither related to any claims or defenses at issue in these Adversary Proceedings nor are they otherwise permitted under Section 4(G) of the Litigation Procedures Order.

The Trustee further objects to this Request to the extent that fact discovery was closed prior to the service of these Requests or is otherwise untimely pursuant to the operative case management order in any of the applicable Adversary Proceedings (Objection No. 4).

Further, the Trustee objects to the service of this Request, which appears to seek Documents that are related to the December 20, 2016 deposition testimony of Bernard L. Madoff, in any adversary proceeding that was not expressly authorized by the Bankruptcy Court to participate in the Madoff Deposition (Objection No. 5).

The Trustee responds that he has conducted a reasonable search that did not yield any agreements responsive to this Request.

Request No. 2

All documents relating in any way to the document requested in “1” above.

Response to Request No. 2

The Trustee objects to this Request to the extent it calls for Materials Prepared Post-December 11, 2008 (Objection No. 1). The Trustee will not search for, review, or produce such Documents.

In addition, the Trustee objects to this Request to the extent it calls for Redundant, Cumulative, and Marginally Relevant Documents (Objection No. 2). The proportionality standards articulated in Fed. R. Civ. P. 26 do not require the Trustee to produce “all” documents responsive to this Request.

In addition, the Trustee objects to this Request to the extent it seeks documents outside the scope of relevance (Objection No. 3). This Request is not related to any claims or defenses at issue in these Adversary Proceedings, nor is it permitted under Section 4(G) of the Litigation Procedures Order.

The Trustee further objects to this Request to the extent fact discovery was closed prior to the service of these Requests or is otherwise untimely pursuant to the operative case management order in any of the applicable Adversary Proceedings (Objection No. 4).

Further, the Trustee objects to the service of this Request, which appears to seek Documents that are related to the December 20, 2016 deposition testimony of Bernard L. Madoff, in any adversary proceeding that was not expressly authorized by the Bankruptcy Court to participate in the Madoff Deposition (Objection No. 5).

As previously stated, the Trustee conducted a reasonable search that did not yield any agreements responsive to Request No. 1. As such, there are no Documents responsive to Request No. 2.

Date: April 25, 2017
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
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Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
substantively consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the estate of Bernard L. Madoff*

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served this 25th day of April, 2017 by certified mail and electronic mail upon the following:

Helen Davis Chaitman
Chaitman LLP
465 Park Avenue
New York, NY 10022

/s/ Cara McGourty
*An Attorney for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

Appendix A

E-Data Room 1

E-Data Room 1

The following documents are contained in E-Data Room 1:

- Documents related to BLMIS's financial condition;
- Documents related to BLMIS's operations, including the Ponzi scheme;
- BLMIS customer monthly account statements;
- Other BLMIS internal records;
- Transfers of money to, from and within BLMIS; and
- BLMIS's regulatory disclosures.

The documents and data in E-Data Room 1 are organized generally by source, then document type. Some included categories are:

- BLMIS customer monthly account statements and ledgers;
- Data and reports from various electronic sources;
- BLMIS documents and work papers;
- Operational documents;
- FINRA documents;
- Certain documents received from the SEC;
- Some public documents such as plea allocations; and
- Certain hard-copy documents collected from the three floors in the Lipstick Building and BLMIS's off-site storage locations.

E-Data Room 1 is set up as indicated in the following screenshots (rev. 12/5/2015):

The screenshot shows the Relativity Workspaces interface. The browser address bar displays <https://relativity10.cdslegal.com/Relativity>. The interface includes a menu bar (File, Edit, View, Favorites, Tools, Help) and a toolbar. The main content area shows a list of 'Active Cases'.

Name	Case Artifact...	Client Name	Matter Name	Matter Number	Status	Keywords	Database Lo...	Default File L...	Resource Pool	Created On	Last Modifie...	Created By	Client Number
E-Data Room 1_Proof of Fraud and Insolvency	1298651	Baker & Hostettler LLP	SIPC v. BLMIS, et al., Adv. Proc. No 08-1789 (BRL)	00000	Active	Solomon, Jonathan (PM)	WSKSQLCLUST1	\\wsisl01.cdshost	Resource Pool A	12/8/2011 4:04 P	1/15/2015 2:32 P	Smith, Deron	Baker & Hostettler LLP

The screenshot shows the Relativity interface for the 'E-Data Room 1_Proof of Fraud and Insolvency' workspace. The browser address bar displays <https://relativity10.cdslegal.com/Relativity>. The interface includes a menu bar (File, Edit, View, Favorites, Tools, Help) and a toolbar. The main content area shows a list of documents.

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2	Edit BAT SAA000015	BATSAA000018;					BATS 000154	BATS 000184	BATS 000154;	BATS 000184;	BATSAA000015;
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E-Data Room 1_Proof of Fraud and Insolvency

Documents

FIELD TREE

- E-Data Room 1_Proof of Fraud and Insolvency
 - Issues
 - DATA
 - Account Statements and L
 - Microfilm
 - SETCSH17
 - STMTPro
 - StorQM
 - StorQM 1099 Forms
 - DOCUMENTS
 - FINANCIALS
 - [Not Set]

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E-Data Room 1_Proof of Fraud and Insolvency

Documents

FIELD TREE

- E-Data Room 1_Proof of Fraud and Insolvency
 - Issues
 - DATA
 - DOCUMENTS
 - BLMIS Documents and Work Papers
 - BLMIS Operational Documents
 - FINRA
 - MSIL Documents and Work Papers
 - Other Public Documents
 - Avellino, Bienes
 - Bongiorno, Annette
 - Cruel, Jodi
 - DiPascali, Frank
 - Friehling, David
 - Kugel, David
 - Lipkin, Eric
 - Madoff, Bernie
 - O'Hara, Jerome / Perez, George / Bonventre, Dan
 - Other
 - Other Third Party Documents
 - BATS Exchange
 - Chicago Board of Options Exchange
 - Chicago Mercantile Exchange
 - Clearstream Banking SA
 - Daily Stock Records (DSR)

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9 E-Data Room 1_Proof of Fraud and Insolvency

Documents

FIELD TREE

- Madoff, Bernie
- O'Hara, Jerome / Perez, George / Bonventre, Dan
- Other
- Other Third Party Documents
 - BATS Exchange
 - Chicago Board of Options Exchange
 - Chicago Mercantile Exchange
 - Clearstream Banking SA
 - Daily Stock Records (DSR)
 - DTCC
 - FAZ
 - Friehling & Horowitz
 - IBM
 - Interactive Brokers
 - Knight Capital Group
 - London Times
 - OCC
 - Other
- PUBLIC
- SEC
 - Documents Received From SEC
 - SEC Public Documents
- Trustee Documents
- FINANCIALS
- [Not Set]

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9 E-Data Room 1_Proof of Fraud and Insolvency

Documents

FIELD TREE

- E-Data Room 1_Proof of Fraud and Insolvency
 - Issues
 - DATA
 - DOCUMENTS
 - FINANCIALS
 - ADP
 - American Technology Research
 - Anglo Irish Bank
 - Bank of New York (BONY)
 - Bankers Trust
 - Barclays Capital LLC
 - Barclays Lehman
 - Barclays Wealth
 - Bear Stearns
 - Bear Stearns Order Execution Services
 - BLMIS Financial Statements
 - BLMIS General Ledgers
 - Chase
 - CIBC
 - Cohmad
 - Cohmad Securities
 - Cohmad Securities-Bear Stearns
 - Commerce Bank
 - Credit Suisse
 - Fidelity

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9 E-Data Room 1_Proof of Fraud and Insolvency

Documents

FIELD TREE

- Fidelity
- Friedman Billings Ramsay & Co
- Gabelli & Company
- Gordon Haskett Capital Corp
- Imperial Capital
- Invoices and Related
- Janco
- Johnson Rice & Co
- JPMorgan Chase (JPMC)
- Lehman Brothers
- Link Brokers Derivatives Corp
- M&T Securities
- Merrill Lynch
- Merriman Curhan Ford
- Miller Tabak & Co
- Morgan Stanley
- MSIL FINANCIALS
- National Westminster Bank PLC
- Needham & Company
- Pali Capital
- Raymond James
- Royal Bank of Scotland
- Samson Capital Advisors LLC
- Tradetrek Securities
- UBS

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Documents

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- Johnson Rice & Co
- JPMorgan Chase (JPMC)
- Lehman Brothers
- Link Brokers Derivatives Corp
- M&T Securities
- Merrill Lynch
- Merriman Curhan Ford
- Miller Tabak & Co
- Morgan Stanley
- MSIL FINANCIALS
- National Westminster Bank PLC
- Needham & Company
- Pali Capital
- Raymond James
- Royal Bank of Scotland
- Samson Capital Advisors LLC
- Tradetrek Securities
- UBS
- Wachovia
- Wachovia Capital Markets
- Wall St Access
- [Not Set]

0 Selected Item(s)

#	DocID	EndDoc	Bates Begin...	Bates End A...	Folder Begin	Folder End	Original Bat...	Original Bat...	Bates_Num...
1	Edit BAT SAA000015	BATSAA000015;					BATS 000152	BATS 000152	BATS 000152; BATSAA00001
2	Edit BAT SAA000015	BATSAA000018;					BATS 000154	BATS 000184	BATS 000154; BATS 000184; BATSAA00001 BATSAA00001
3	Edit BAT SAA000018	BATSAA000018;							BATSAA00001
4	Edit BAT SAA000018	BATSAA000019;							BATSAA00001 BATSAA00001
5	Edit BAT SAA000019	BATSAA000019;							BATSAA00001
6	Edit BAT SAA000019	BATSAA000019;							BATSAA00001
7	Edit BAT SAA000019	BATSAA000019;							BATSAA00001

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E-Data Room 1_Proof of Fraud and Insolvency

Documents

FIELD TREE

- E-Data Room 1_Proof of Fraud and Insolvency
 - Issues
 - DATA
 - DOCUMENTS
 - FINANCIALS
 - ADP
 - American Technology Research
 - Anglo Irish Bank
 - Bank of New York (BONY)

0 Selected Item(s)

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2	<input type="checkbox"/>	Edit	BATSAA000015	BATSAA000018;				BATS 000154	BATS 000184	BATS 000154; BATS 000184; BATSAA00001 BATSAA00001
3	<input type="checkbox"/>	Edit	BATSAA000018	BATSAA000018;						BATSAA00001
4	<input type="checkbox"/>	Edit	BATSAA000018	BATSAA000019;						BATSAA00001 BATSAA00001
5	<input type="checkbox"/>	Edit	BATSAA000019	BATSAA000019;						BATSAA00001
6	<input type="checkbox"/>	Edit	BATSAA000019	BATSAA000019;						BATSAA00001
7	<input type="checkbox"/>	Edit	BATSAA000019	BATSAA000019;						BATSAA00001

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Appendix B
BLMIS Searchable Database

Repositories in the BLMIS Searchable Database

- Active email;
- Active desktops;
- Certain backup data;
- Other hard drives on the 17th floor of the Lipstick Building, including the 17th floor file share; and
- Certain hard-copy account documents from the 17th floor, 18th floor, 19th floor and the basement of the Lipstick Building and off-site storage

Custodians in BLMIS Searchable Database — Where Identifiable (rev. 12/5/2015)

EMPLOYER	EMPLOYEE NAME	POSITION
BLMIS	Abend, Reed	Trader Assistant / OTC Trader
BLMIS	Allen, Garrett K.	Trading Asst
MSIL	Allen, Peter	Former MSIL Director, Consultant
BLMIS	Anderson, Semone G. Blair	Clerk / Annette Dept
PRIMEX-1YV, PRIMEX-3HV	Anselmo, Michael J.	Management
BLMIS	Arbitrario, Maurice	Network Engineer
BLMIS	Arroyo, Richard	Research Assistant, Customer Service (Systems) / A/E
BLMIS	Astuto, Toniann	Admin Asst
BLMIS	Barutcuoglu, Zafer	
BLMIS	Batalion, Sally	
BLMIS, MADOFF BROKERAGE & TRADING TECHNOLOGIES	Benetar or Benatar, Michael	Manager
BLMIS, PRIMEX-1YV, PRIMEX-3HV	Berkowitz, Herman David	Lawyer, Admin
BLMIS	Berkowitz, Peter	Asst Trader / Proprietary Trader
COHMAD SECURITIES	Berman, Stanley M.	Broker
BLMIS	Birch, Lawrence (Larry)	Sales & Marketing / Client Services
BLMIS	Bongiorno, Annette (Argese)	Admin Asst / Secretary / Manager
N/a	Bongiorno, Rudy	
BLMIS	Bonventre, Daniel	Auditor, Director of Operations
BLMIS	Bonventre, John R.	Investment Banking / Clerical / Back Office
BLMIS	Bonventre, Peter	Asst Trader
BLMIS	Brown, Clive A.	Administration
BLMIS	Bruttomesso, Garrett L.	Trader / Proprietary Trader
COHMAD SECURITIES	Buccellato, Rosalie	Clerk
	Buchanan, Leanne	
BLMIS	Buchmueller, Elizabeth	Admin
MSIL	Byrom, Matt	Trader
BLMIS	Cacas, Eduardo (Ed) Jr.	Business Systems Analyst
BLMIS	Camvycis, Thomas	Trader / Proprietary Trader
BLMIS	Cancemi, Joann	
BLMIS	Caputo, Richard	Network Admin
BLMIS	Cardile, Robert	Trader / Systems Analysts
BLMIS	Carlson, David	Trader, Admin / Proprietary Trader
BLMIS	Carrero, David	Trader, Admin
BLMIS, MADOFF BROKERAGE & TRADING TECHNOLOGIES LLC, PRIMEX TRADING	Casanova, Alberto C. (Al)	BLMIS-Management, Primex-Co-Manager
BLMIS, PRIMEX-3HV	Chen, Terrence (Xi)	Developer

BLMIS	Clarke, Prunella D.	Admin / Housekeeping
BLMIS	Cohn, Leon	Analyst
COHMAD SECURITIES	Cohn, Marcia B.	VP-Retail Brokerage
BLMIS, COHMAD SECURITIES	Cohn, Maurice Jay (Sonny)	Analyst
BLMIS	Colin, Stephani R.	Admin Asst
BLMIS	Collado, Ralph	Facilities Mgr
BLMIS	Collins, Richard (Rich)	Facilities Mgr
BLMIS	Concepcion, Darlene R. Coleman	Secretary, Clerk
BLMIS	Connelly, Andrew B.	Comm Tech
MSIL	Conway, Simon	
BLMIS	Cooper, Jeffrey M.	Asst Trader
BLMIS	Copersino, Albert S.	Proprietary Trader
BLMIS	Cotellessa-Pitz, Enrica	Controller
BLMIS	Coughlin, Edward (Ed) T.	Trader, Management
BLMIS	Crupi, JoAnn (Jodi)	Clerical / Manager
BLMIS	Curcione, Louis J. III	Trader
BLMIS	Cutroneo, Kenneth R.	Asst Trader
MSIL	Dale, Christopher (Chris)	Executive Director
BLMIS	Damiba, David E.	Proprietary Trader
BLMIS	De Lisi or Delisi, Frederick (Fred)	Communications Tech
MSIL	Deadman, Peter	Trader
BLMIS	Dee, Daniel	Trader
BLMIS	Delgado, Iris V.	Administration
PRIMEX-3HV	DeMaso, Christopher M. (Chris)	Sales
BLMIS	DiPascali, Frank	Manager
BLMIS	Distenfeld, Eric Jay	Portfolio Manager
BLMIS	Dolinsky, Craig	Trader / A/E
BLMIS	Dubler, Scott A.	Proprietary Trader
BLMIS	Duffy, Daniel	Listed Trader
MSIL	Dupont, Gregoire	
BLMIS	Eckhaus, Daniel (Dan)	Systems
BLMIS	Eisen, Barry	
BLMIS	Esbenshade, Zi Yah	A/E
BLMIS	Eversley, Nicholas C.	Programmer
BLMIS	Falcone, Robert	Comp Prog
BLMIS	Feld, Anthony C.	Proprietary Trader
BLMIS	Feng, Charles	Trader
BLMIS	Feng, Karl	Assistant Trader
MSIL	Fenwick, Julia	Business & Systems Manager
BLMIS	Ferraro, Jeffrey (Jeff)	Operations Manager / Back Office
BLMIS	Ferraro, Marc	Securities Trader / Back Office / Clerical
BLMIS	Flax, Elana Y.	Trader
MSIL	Flax, Leon	Executive Director, Director-Finance
BLMIS	Fleischman, Barry	Trader / ROBO
BLMIS	Fleming, Junior Antonio	Driver, Special
BLMIS	Flores, Enrique (Rick)	Senior Order Clerk / Systems Analysts
BLMIS	Fong, Kevin	Sr. Software Engineer
MSIL	Foster, Adam	
MSIL	Frachet, Gilles	Trader
BLMIS	Fraga, Carlos	Systems
BLMIS	Friedman, Ari	Marketing

BLMIS	Friedman, Steven D. (Steve)	Prop Trader
BLMIS	Fuller, Tracey L.	Admin
BLMIS	Fullerton, Stephanie H.	Lotus Notes Sys. Admin
BLMIS	Garcia, Patricio (Pat)	
BLMIS, COHMAD SECURITIES	Garcia, Vincent J.	Client Services
BLMIS	Gatoff, Danna Beit-Halachmy	
BLMIS	Gavlik, Margaret Washburn	Trader, Management
MSIL	George, Alastair	Trader
BLMIS	Glassman, Brett T.	Asst Trader / Proprietary Trader
BLMIS, MADOFF BROKERAGE & TRADING TECHNOLOGIES	Glazer, Michael	Programmer
BLMIS	Goldman, Mark S.	Equities Trader
BLMIS	Graves, William	Analyst, Trader
BLMIS	Green, Ari	Analyst
COHMAD SECURITIES	Greenberg, Jonathan B.	Trader
MSIL	Grice, Dylan	Trader (still on probation)
BLMIS	Gross, Jason M.	Technical Support, Systems
BLMIS	Gutman, Robert A.	Proprietary Trader
BLMIS	Gutzwiller, Mark G.	Prop Trader
MSIL	Hagnesten, Marcus	Trader
MADOFF BROKERAGE & TRADING TECHNOLOGIES	Hakker, Martin II	Business analyst
BLMIS	Hemrajani, Haresh C.	Computer Tech, Programmer
MSIL	Henchey, James	Trader
BLMIS	Hendell, Scott	Stock Loan Clerk, Messenger
BLMIS	Hoffman or Hoffmann, Brian C.	Trader
BLMIS	Hooey, Rolland C. Jr. (Ron)	Traders Assistant / ROBO
BLMIS	Horwitz, Daniel A.	Proprietary Trader
MSIL	Hughes, Marcus (Marc)	Trader
MSIL	Hui, Ying-Ting (William?)	Accountant
BLMIS	Hutchinson, Kenneth R. (Kenny)	Programmer
BLMIS, PRIMEX TRADING	Ibrahim, Nader	Computer Support
BLMIS	Imbruce, Gregg	Proprietary Trader
BLMIS	Jackson, Winifred P. (Winnie)	Bookkeeping, Clerk / Annette Dept
BLMIS	Jacobson, Jeffrey H. (Jeff)	Assistant Trader / Proprietary Trader
COHMAD SECURITIES	Jalon, Cyril D.	Account Executive
BLMIS	Jimenez, Anthony	Systems, Technician
BLMIS	Joel Burger, Amy	Back Office / Clerical
BLMIS	Jones, Belle M.	Admin, Acct Mgr
BLMIS	Jones, Richard P.	Trader / A/E
BLMIS	Jorgenson, George	Comm. Specialist
BLMIS	Kanning, Robert Keith	Assistant Trader / OTC Trader
BLMIS	Kay, Stephen	Sales
BLMIS	Kelly, Edward M. (Ted)	Customer Service
BLMIS	Kelly, John P.	A/E Desk, Customer Service / Client Services
BLMIS	Khan, Dorothy	Clerk, Data Entry / Annette Dept
BLMIS	King, Seon A.	Storage Clerk
BLMIS, MADOFF BROKERAGE & TRADING TECHNOLOGIES LLC	Knapp, Brian	Quality Assurance
BLMIS	Koneru, Rajeth	PC Support
BLMIS	Koster, Deborah T.	IT Manager, Technician
BLMIS	Kramer, Kenneth B.	Trader

PRIME-1YV, PRIMEX-3HV	Kugel, Craig Ian	Management
BLMIS	Kugel, David L.	Trader, Manager
COHMAD SECURITIES	Kurzrock, Morton D.	Account Executive
BLMIS	Lanier, Adam K.	Systems Administrator
BLMIS	Larsen, Jean	Receptionist
	Lee, Andrew	
BLMIS	Lenaghan, Jonathan Thomas	Quant. Analyst, Software Programmer
BLMIS	Lipkin, Eric S.	Human Resources, Accounting / Systems Analyst, 401k Administrator, Office & Clerical
BLMIS	Lippitt, Matthew	Trader
PRIMEX-1YV, PRIMEX-3HV	Loman, Helaine B.	Analyst
BLMIS	Lorenzo, Andrew J.	NASDAQ Trader
MSIL	Lyons, Stephen (Steve)	Trader
BLMIS	Madoff, Andrew H.	Director of Prop Trading
BLMIS	Madoff, Bernie	Chairman
BLMIS	Madoff, Mark D.	Trader
BLMIS	Madoff, Peter B.	Sr. Managing Director
N/a	Madoff, Ruth	
BLMIS	Madoff, Shana Swanson	In-house counsel, Management
	Skoller	
BLMIS	Magnus, Dumarsais	Admin, Filing
BLMIS	Marasa, Gaetano (Guy)	Computer technician, network engineer
BLMIS?, MSIL?	Marshall, Tony	
BLMIS	Mastrangelo, Ralph A.	Computer, Systems
BLMIS	Matthews, Jay E.	Asst Trader
BLMIS, PRIMEX TRADING	Mayer, Leonard	Admin / Management
BLMIS	McGoldrick, John	Trader
BLMIS	McGuire, Kevin T.	Proprietary Trader
BLMIS	McMahon, Robert	Systems
BLMIS	Mehta, Neilay K.	Proprietary Trader
BLMIS	Meyer-Mitchell, Merlin	ROBO
BLMIS	Michalowski, Richard	Asst Trader
BLMIS	Mortenson, Lisa N.	
BLMIS	Moses, Michael	Systems
BLMIS	Moy, Peter	Engineer, Systems
BLMIS	Mui, Alethea	Computer operator, clerical / Annette Dept
BLMIS	Nabile, Walid	Technical support, Systems
BLMIS	Nano, Glenn A.	Proprietary Trader
MSIL	Newing, John	Trader
BLMIS	Nunez, Raphael or Rafael	System operator
BLMIS	Nunez, William A.	Clerk, Systems Operator
	(Rodriguez)	
BLMIS	O'Hara, Jerome T. (Jerry)	Systems analyst
BLMIS	Ortiz, Magdalena (Maggie)	Back Office / Clerical
BLMIS	O'Toole, Elizabeth (Liz)	A/E
	Tramontano Gocs	
BLMIS	Padala, Matthew J.	Client Services
BLMIS	Parker, Raymond H.	
BLMIS	Peacock, John Pyper, III	Comm. Mgr
BLMIS, PRIMEX-1YV, PRIMEX-EHV	Pechatnikov, Yefim	St. Software Developer, Computer programmer
MSIL	Pengelly, Charis	Compliance Assist
BLMIS	Pennachio, Daniel P. (Dan)	Management / Back Office / Clerical

BLMIS	Perez, George	Programmer analyst / Systems Analysts
BLMIS	Perez, Raul G., Jr.	Asst Trader / Client Services
BLMIS	Persaud, Sharda Semboo	Clerical
BLMIS	Pitt, David A.	Asst Trader
BLMIS	Quatrone, Jennifer	Asst Trader
BLMIS	Raghunauth, Asha	Clerical
COHMAD SECURITIES	Raghunauth, Martha Linda	Secretary
MSIL	Raven, Stephen	Executive Director, CEO
BLMIS	Reardon, Erin	Asst acct mgr, clerical / Systems Analysts
BLMIS	Revels, Matthew	
BLMIS	Ringelstein, Daniel August (Danny)	Trader
BLMIS	Rosenberger, Jamie Lynn	Proprietary Trader
BLMIS	Ross, Richard S. (Rich)	Asst Trader
BLMIS	Sanchez, Frankie	Systems technician
BLMIS	Sara, B. John Eden	Asst Trader
	Savill, Stephen	
	Schanker, Herbert	
BLMIS	Scharlop, Benjamin H. (Ben)	Programmer technician
BLMIS	Schwartz, Robert S. (Bob)	Technician
BLMIS	Schwartz, Robin S.	Stock Trader, Listed Trader
BLMIS	Shapiro, Stanley	Sales, Analysis, Trader
BLMIS	Shaps, Ryan M.	PNS, Back Office / Clerical
BLMIS	Sharr, Henry H.	Developer, Oracle DBA, Systems
BLMIS	Shaw, Christopher Riley (Chris)	Proprietary Trader
BLMIS	Shen, Hong (Sam)	Technician, Systems
BLMIS	Sheredos, Robert Y. (Bob)	Computer programmer, Systems
BLMIS	Sibbley, Errol C.	Special
MSIL	Slater, Annabel	Receptionist
BLMIS	Smith, Jeremy Iain	Proprietary Trader
BLMIS	Sobel, Richard G. (Rick)	Lawyer
BLMIS	Solomon, Elaine R. Covell	Secretary
BLMIS	Sondike, Brett A.	Sales / A/E
BLMIS	Squillari, Eleanor Plaia	Assistant, Secretary
BLMIS	Sroka, Heath B.	Trading Asst / Proprietary Trader, Sales
BLMIS	Stampfli, Joshua R. (Josh)	Trader / ROBO
MSIL	Stevenson, Malcolm	Executive Director
BLMIS	Suazo, Joseph H. (Joe)	Senior Programmer
BLMIS	Sullivan, Stefanie A.	Systems
BLMIS	Sutton, Kurt E.	Jr. Analyst, Trader
BLMIS	Tannenbaum, Michael	Research Assoc.
BLMIS	Taratunio, Deborah A. (Debi)	Manager / A/E
MSIL	Thomas, Leanne	Settlements Supervisor
BLMIS	Tiletnick, Peter G.	Intern A/E, Systems, Trader / Assistant Trader
BLMIS	Tiletnick, Walter	Clerk, Management
BLMIS, MSIL	Toop, Philip John (Phil)	Securities Trader, Executive Director-MSIL
BLMIS	Torres, Elvis R.	Computer Operator
BLMIS	Trensky, Michael L.	Trader
BLMIS	Tringali, Barbara	Back Office / Clerical
BLMIS	Tsinkelis, John E.	Unix Administrator
BLMIS	Tsuchida, Kathryn	Researcher/ Proprietary Trader

MSIL	Tunak, Kevin	Computer Consultancy
FRANJEAN AT SEA LTD	Tuvyman, Christopher	
BLMIS	Vaccaro, Andrew	Asst Trader
MSIL	Verde, Francesco	Trader
BLMIS	Vicinelli, Paolo A.	Proprietary Trader
BLMIS	Viggiano, Paul L.	Market Maker
MSIL	Vines, Tim	Operations & Settlements Manager
BLMIS	Voigt, Hendrik M.	Asst Trader / Proprietary Trader
BLMIS	Vollerston or Vollersten or Vollertsen or Vollertsten, Joshua	Trader Assistant
BLMIS	Ward, Laurence Curtis (L. Curtis)	Asst Trader / Proprietary Trader
BLMIS	Watkins, Michella L.	Admin / Back Office / Clerical
BLMIS	Weber, Robert J. (Bobby)	Clerical / Cage
BLMIS	Weintraub, Elizabeth (Liz)	Head of Information Technology
BLMIS	Westhuis, Kathryn M. (Kate)	Assistant Trader
BLMIS	White, Charlene D.	Data Entry Operator / Back Office / Clerical
BLMIS, PRIMEX TRADING	Wiener or Weiner, Charles	Stock Broker / Management, Director of Administration
BLMIS	Wong, William W.	Proprietary Trader
MSIL	Wood, Amber	Compliance Officer
BLMIS	Yeh, Richard Cheng-I	Quantitative Analyst, Software Developer
MSIL	Yelsey, Neil D.	Trader
BLMIS	Yelsey, Neil D.	Proprietary Trader
BLMIS	Zachar, Ned P.	Proprietary Trader
BLMIS	Zelenko, Vladimir	Software Developer
	Zhang, BaoShan (Johnny)	
PRIMEX-1YV	Zhang, Xiaoling (Heather)	Computer Systems Analyst
BLMIS	Zheng, Xing	Sales / ROBO

Appendix C

SQL Databases

Structured Query Language (“SQL”) Databases

The sources of data loaded into the SQL Databases include, without limitation:

- StorQM Optical Storage Device: BLMIS used the StorQM application to store historical customer records from December 1995 through November 2008, which include, but are not limited to, Customer Statements and Portfolio Management Reports (“PMRs”).
- Microfilm reels: BLMIS used this storage medium for historical customer records, which include, but are not limited to Customer Ledgers and PMRs as well as Portfolio Management Transaction Reports (“PMTs”).
- Spiral notebooks: BLMIS personnel recorded cash deposits and withdrawals in handwritten stenographic (spiral-bound) notebooks relating to certain customer accounts. Spiral notebooks were identified for the periods from April 1985 through September 1990, and August 1991 through November 1994.
- BLMIS’s bank records, from various banks, including monthly bank statements, check images, wire transfer records, and deposit slips.
- House 17 AS/400 System: This is the computer system that the BLMIS’s Investment Advisory Business used to manage customer accounts and generate Customer Statements.
- House 5 AS/400 System: This is the computer system that the BLMIS Market Making and Proprietary Trading businesses used to track and report trading and position information.
- House 17 Backup Tapes: These tapes were created in the normal course of business at BLMIS and contain historical and contemporaneous purported customer activity and customer records from the House 17 AS/400 System.
- House 5 Backup Tapes: These tapes were created in the normal course of business at BLMIS and contain historical and contemporaneous backups of the trading and position records from the House 5 AS/400 System.
- Madoff Securities International Ltd. historical trading and position records.
- Electronic files recovered from BLMIS employee computers and network folders.

- Electronic files recovered from BLMIS's Network Accessed Shares ("NAS").
- Cohmad Cash Database.
- Bloomberg Instant Messaging: Instant messages passed between House 5 traders.
- BLMIS phone logs from Avaya and BlackBerry.
- Security swipe data of employees and visitors from the Lipstick Building.
- Reporting data from the Depository Trust & Clearing Corporation ("DTCC").
- Reporting data from the Options Clearing Corporation ("OCC").
- Bloomberg Market Data.
- Data from the Center for Research in Security Prices ("CRSP").
- Data from the Chicago Board Options Exchange ("CBOE").